

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

---

<b>In re:</b>	<b>§</b>	<b>Chapter 11</b>
<b>TMT PROCUREMENT CORP., <i>et al.</i><sup>1</sup></b>	<b>§</b>	<b>Case No. 13-33763</b>
<b>DEBTORS.</b>	<b>§</b>	<b>Jointly Administered</b>

---

**DECLARATION OF JIN YU-LAI IN SUPPORT OF DEBTORS' REQUEST FOR  
RELIEF AT OCTOBER 15, 2013 HEARING REGARDING M.V. A DUCKLING**

[Related Docket Nos. 491, 553 & 555]

TMT Procurement Corporation, *et al.*, the above-captioned debtors and debtors in possession (together, the “Debtors”), by and through their proposed undersigned attorneys, Bracewell & Giuliani LLP, hereby file, and attach as **Exhibit 1**, the Declaration of Jin Yu-Lai concerning the status of the arrest proceedings of the *M.V. A Duckling*. This Declaration is submitted in support of the relief the Debtors will request to this Court at the hearing presently scheduled for October 15, 2013 on the Debtors’ Emergency Motion for Debtor in Possession Postpetition Secured Financing and Related Relief [Dkt. No. 491]. The Debtor A Duckling Corporation will seek Court permission to use debtor in possession financing (except to the extent that the Court orders the usage of cash collateral) for the purpose of releasing from arrest and restarting the *M.V. A Duckling*.

---

<sup>1</sup> The Debtors in these chapter 11 cases are: (1) A Whale Corporation; (2) B Whale Corporation; (3) C Whale Corporation; (4) D Whale Corporation; (5) E Whale Corporation; (6) G Whale Corporation; (7) H Whale Corporation; (8) A Duckling Corporation; (9) F Elephant Inc.; (10) A Ladybug Corporation; (11) C Ladybug Corporation; (12) D Ladybug Corporation; (13) A Handy Corporation; (14) B Handy Corporation; (15) C Handy Corporation; (16) B Max Corporation; (17) New Flagship Investment Co., Ltd; (18) RoRo Line Corporation; (19) Ugly Duckling Holding Corporation; (20) Great Elephant Corporation; and (21) TMT Procurement Corporation.

Respectfully submitted,

**BRACEWELL & GIULIANI LLP**

By: /s/ William A. (Trey) Wood III  
William A. (Trey) Wood III  
Texas Bar No. 21916050  
Trey.Wood@bgllp.com  
Jason G. Cohen  
Texas Bar No. 24050435  
Jason.Cohen@bgllp.com  
711 Louisiana, Suite 2300  
Houston, Texas 77002  
Telephone: (713) 223-2300  
Facsimile: (713) 221-1212

-and-

Evan Flaschen  
(admitted *pro hac vice*)  
Evan.Flaschen@bgllp.com  
Goodwin Square  
225 Asylum Street, Suite 2600  
Hartford, CT 06103  
Telephone: (860) 947-9000  
Facsimile: (860) 246-3201

-and-

Robert G. Burns  
(admitted *pro hac vice*)  
Robert.Burns@bgllp.com  
1251 Avenue of Americas, 49th Floor  
New York, New York 10020-1104  
Telephone: (212) 508-6100  
Facsimile: (800) 404-3970

**COUNSEL FOR THE DEBTORS AND  
DEBTORS IN POSSESSION**

**CERTIFICATE OF SERVICE**

The undersigned certifies that on October 14, 2013, a true and correct copy of this document was served on all parties on the attached master service list by electronic means as listed on the Court's ECF noticing system and/or by electronic mail as indicated.

*/s/ Jason G. Cohen*  
\_\_\_\_\_  
Jason G. Cohen